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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Adrian Romero;

Plaintiff,

vs.

COUNTY OF LOS ANGELES, a  
Public Entity; SERGIO CAMPOS;  
DAMIEN GUERRERO; AND  
JUSTIN PEREZ; and DOES 1 through  
10, inclusive;

Defendants.

**CASE NO.: 2:23-cv-02025-GW-PVC**  
[Hon. George H. Wu]

**STIPULATION TO CONTINUE  
EXPERT DISCOVERY CUTOFF  
DEADLINE; [PROPOSED] ORDER**

**TO THIS HONORABLE COURT:**

IT IS HEREBY STIPULATED BY AND BETWEEN ADRIAN ROMERO (“Plaintiff”), and COUNTY OF LOS ANGELES; SERGIO CAMPOS; DAMIEN GUERRERO; and JUSTIN PEREZ (“Defendants,” collectively “the Parties”) as follows:

**GOOD CAUSE STATEMENT:**

1. The parties worked diligently to conduct and complete fact discovery before the Fact Discovery Cutoff Deadline of December 15, 2023. All named parties were deposed.
2. To enable retained experts the ability to review the deposition transcripts in order to meaningfully opine on the facts of the case, the Parties propose a continuation of the Expert Discovery cutoff date of February 16, 2023.
3. The transcripts of all completed depositions are currently still being finalized, and the Parties’ respective retained experts would benefit from the review of the deposition transcripts. Pursuant to this Court’s Scheduling Order (Dkt. No. 23), the Parties have met and conferred and propose an Initial Expert Discovery Disclosure Deadline of January 19, 2024 and a Rebuttal Expert Disclosure Deadline of February 2, 2023.
4. The Parties have also identified Richard Copeland as their mutually agreed upon mediator and have scheduled a mediation with Mr. Copeland for January 5, 2024. Plaintiff will file the appropriate ADR forms with the Court.
5. This is the first request of the Parties to continue any pre-trial dates and deadlines in this matter.

Based on the foregoing, the Parties hereby stipulate and request a continuance of the Court’s scheduling order and case management deadlines along the following lines:

EVENT	CURRENT DEADLINE	REQUESTED DEADLINE
Initial Expert Disclosures	Not Set	01/19/2024
Rebuttal Expert Disclosures	Not Set	02/02/2024
Expert Discovery Cut-Off	01/26/2024	02/16/2024
Motion Hearing Deadline	02/26/2024	No Change
Motions in Limine Filing Deadline	3/21/2023	No Change
Joint Pre-trial Filings	03/22/24	No Change
Final Pre-Trial Conference	03/28/24 at 8:30 a.m.	No Change
Trial	04/09/24 at 9:00 a.m.	No Change

IT IS SO STIPULATED.

DATED: December 19, 2023

LAW OFFICES OF DALE K. GALIPO

By: /s/Shannon Leap

Dale K. Galipo

Shannon J. Leap<sup>1</sup>

Attorneys for Plaintiff.

DATED: December 19, 2023

HURRELL CANTRALL LLP

By: /s/ Katherine E. Orletsky

THOMAS C. HURRELL

KATHERINE E. ORLETSKY

Attorneys for Plaintiffs

<sup>1</sup> As the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.